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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

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LULA WILLIAMS, et al., : NO.: 3:17-cv-00461

Plaintiffs : :

vs. : :

BIG PICTURE LOANS, : :

LLC, et al., : :

Defendants : :

----- : -----
RENEE GALLOWAY, et : NO.: 3:18-cv-406-REP
al., : :

Plaintiffs : :

Vs. : :

BIG PICTURE LOANS, : :

LLC, et al., : :

Defendants : :

- - -

Tuesday, May 26, 2020

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REMOTE VIDEOTAPED DEPOSITION of JOETTE
PETE, taken pursuant to notice, commencing at
approximately 10:10 a.m., before Lynn Parlapiano,
Professional Court Reporter and Notary Public in
and for the Commonwealth of Pennsylvania.

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2 THE VIDEOGRAPHER: We are now on
3 the record. This begins Video 1 in the
4 deposition of Joette Pete in the matter of Lula
5 Williams, et al. versus Big Picture Loans, LLC.

6 Today is Tuesday, May 26, 2020.

7 The time is 10:12 a.m. This deposition is being
8 taken remotely at the request of Armstrong
9 Teasdale.

10 The videographer is Daniel Katz,
11 the court reporter is Lynn Parlapiano and the
12 trial tech is Josh Pinkus, all three of Magna
13 Legal Services.

14 Counsel and all parties present
15 will be noted on the stenographic record.

16 Will the court reporter please
17 swear in the witness?

18 JOETTE PETE, after having been
19 first duly sworn, was examined and testified as
20 follows:

21 MR. SCHEFF: I just want to note
22 for the record that this deposition is being
23 conducted actually in two cases, the Williams
24 case as well as Galloway versus Big Picture

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1 you what specific documents were being shredded,
2 correct?

3 A. No.

4 Q. And these other people whose names you
5 can't remember today, they didn't tell you what
6 specific documents were being shredded either; is
7 that correct?

8 A. No.

9 Q. Did they say what the documents even
10 related to?

11 A. No. I just didn't pay attention 'cause
12 I'm like I don't speak on what I didn't see or
13 know of personally.

14 Q. Okay. Excuse me.

15 Ms. Pete, you electronically signed a
16 declaration in this case. Do you remember that?

17 A. Yes.

18 Q. And what was the reason why you signed
19 a declaration?

20 A. I don't have -- I don't think I had a
21 car, computer. I don't -- and it is 2020.

22 Q. I'm sorry. I'm asking why -- how did
23 it come about that you signed a declaration in
24 this case?

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1 2 percent. 2 percent is not a whole of a
2 hundred.

3 BY MS. DRAKE:

4 Q. Did you have concerns about the tribe's
5 continued involvement in tribal lending, were you
6 worried about that?

7 MR. SCHEFF: Objection, timeframe.

8 THE WITNESS: Yes.

9 BY MS. DRAKE:

10 Q. What were you worried about?

11 A. Our sovereignty as a tribe.

12 Q. Why were you worried about that?

13 A. Because the whole tribe as a whole
14 could be removed.

15 Q. Could be removed from what?

16 A. From being federally recognized for
17 abusing our sovereignty.

18 Q. Were you worried about -- well, let me
19 ask you this.

20 You said that the online lending
21 business was not wholly owned by the tribe. In
22 your view, who did own the business?

23 MR. SCHEFF: Objection, lack of
24 foundation.

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1 MR. SCHEFF: Well, I don't know
2 whether you have a right to do so, but we'll look
3 at the protective order and we can certainly talk
4 about it. Thank you.

5 THE VIDEOGRAPHER: Okay. Nothing
6 further. The time is 4:46 p.m. This concludes
7 the deposition. We're off the record.

8 (Witness excused.)

9 (Deposition concluded.)

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